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Submitted to:
**United States Environmental
Protection Agency
290 Broadway
New York, New York 10007-1866**

**PCB REMEDIATION—
RISK BASED
CONFIRMATION**

**Flushing Industrial Park
Flushing, New York**

Project Number: 30141

October 2006



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October 26, 2006

Mr. Alan J. Steinberg
Regional Administrator
United States Environmental Protection Agency – Region II
290 Broadway
New York, New York 10007-1866

Re: PCB Remediation – Risk-Based Confirmation Under 40 CFR § 761.61(c)
Flushing Industrial Park
College Point Boulevard and 40th Road, Flushing, New York

Dear Mr. Steinberg:

AKRF Engineering, P.C. (AKRF) represents C.E. Flushing, LLC, a company pursuing the cleanup and redevelopment of the Flushing Industrial Park property in Flushing, Queens (the Property) as a Volunteer under the New York State Brownfield Cleanup Program (BCP). The investigation and remediation have been performed under the guidance of the New York State Department of Environmental Conservation (NYSDEC). The location of the Property is shown on the attached Figure 1.

Via correspondence dated September 1, 2005 (attached), AKRF notified the United States Environmental Protection Agency (USEPA) of the intention to proceed with self-implemented cleanup of polychlorinated biphenyl (PCB) remediation waste under 40 CFR 761.61(a). As we discussed with Mr. Daniel Kraft of the USEPA Region II Toxics Section last November, and documented in our correspondence dated December 1, 2005, all necessary excavation below the water table would be undertaken to the extent practically achievable. At that time, Mr. Kraft advised us that if endpoint samples revealed that soils with concentrations of PCBs above 10 parts per million (ppm) — 10 ppm was NYSDEC's Site Specific Action Level (SSAL) for soil cleanup, given that the entire site would ultimately be capped — could not be excavated, we should apply for a risk-based approval. The post-excavation bottom endpoint samples in fact indicated certain limited areas in which PCB concentrations exceeded 10 ppm (but were no higher than 39 ppm). As such, this correspondence seeks confirmation that the remediation undertaken constitutes an appropriate risk-based approach for PCB remediation under 40 CFR 761.61(c), to the extent required.

BACKGROUND

Environmental studies conducted on the Property between 1989 and 2005 indicated the presence of soil with concentrations of PCBs in excess of 50 ppm. In addition, the investigations identified soil and groundwater with elevated levels of heavy metals, pesticides, volatile organic compounds and semi-volatile organic compounds.

From February to September 2006, remedial excavation was performed on the Property. To date, 22,762 tons of material have been disposed of off-site as hazardous waste (consisting of 22,174 tons with concentrations of PCBs greater than 50 ppm and 588 tons of RCRA hazardous wastes) and 55,618 tons of material have been disposed of off-site as non-hazardous waste. Some limited excavation in areas previously inaccessible will be conducted later in the year; however, the vast majority of the excavation is completed. The remediation was performed in accordance with the following work plans approved by the NYSDEC, and previously provided to the USEPA: *Revised OU-1: Remedial Action Work Plan and Supplemental Investigation Work Plan*, August 2003; *Revised Interim Remedial Measure Work Plan*, Flushing Industrial Park, Parcels 2 and 3, September 2005; and *Remedial Action Work Plan (RAWP)*, Flushing Industrial Park, Parcels 2 and 3, February 2006.

The remediation on Parcel 1 consisted of the removal of delineated hotspots (soils above the 10 ppm PCB SSAL and/or other SSALs), storage tanks, sewers and geophysical anomalies. The remediation on Parcels 2 and 3 consisted of excavation of all soils to the water table and beyond, as necessary, but limited to practicable depths (with the exception of one sheeted area where the excavation extended approximately 5 to 6 feet below the water table with dewatering to allow for the deep excavation of soils with hazardous concentrations of PCBs).

ENDPOINT SAMPLE RESULTS SUMMARY

Post-excavation bottom and sidewall endpoint samples were collected and analyzed for PCBs (see Tables 1, 2 and 3 attached hereto). The excavation areas and corresponding endpoint sample locations are shown on the attached Figure 2. The extent of residual PCB contamination is shown on the attached Figure 3.

There were no final bottom endpoint samples with PCB concentrations exceeding 50 ppm. There were initially four bottom endpoint sample locations where PCB concentrations exceeded 50 ppm; however, these areas were overexcavated and the deeper sample concentrations were less than 50 ppm. Based on the endpoint samples collected at the bottom of the practicable excavation depth, there were 11 samples clustered in seven areas where PCB concentrations were greater than 10 ppm. These locations are characterized by the following final bottom endpoint samples: EP-39, EP-50, EP-51, EP-65A, EP-81, EP-84, EP-125, EP-130, EP-131, EP-152 and UST-BOTTOM EAST-1. These bottom endpoint samples were collected below the water table, at a surveyed elevation ranging from elevation 1.9 to -1.0 feet, with one location of residual PCBs as deep as elevation -4.8 feet (Figure 3). Elevations are referenced to Queens Borough Datum, which is 2.725 feet above mean sea level.

Post-excavation sidewall samples were collected at the northern and southern Property boundary perimeters. Nine of these samples had PCB concentrations in excess of 10 ppm, five of which had concentrations greater than 50 ppm. These sidewall samples were taken at the Property boundaries to provide the NYSDEC with information representative of off-site conditions; however, off-site remediation is not required of a "non-responsible party" under the BCP (C.E. Flushing, LLC purchased the property from Consolidated Edison Company of New York, Inc. in 1986 and did not store or dispose of PCB items or wastes). As such, no off-site excavation or additional off-site investigation will be performed as part of C.E. Flushing's project. Additionally, adjoining the Property to the north is an elevated roadway (Roosevelt Avenue) and the New York City Transit elevated #7 subway line, which, although they are at a higher elevation than Property grade, have foundation components that preclude additional excavation. Adjoining the Property to the south is 40th Road (a city street to the south of Parcel 1), and private property (south and southwest of Parcels 2 and 3).

EXPOSURE ASSESSMENT

Potentially exposed populations and potential exposure pathways for on-site contamination are evaluated in this section. Based on results from the previous investigations, prior to remediation contaminated media consisted of soil and groundwater, including areas of light non-aqueous-phase liquid (LNAPL).

Potential receptors include: on-site environmental and construction workers during remediation and construction of the proposed redevelopment, future on-site residents, workers and customers of the proposed (retail) development, future on-site maintenance workers, off-site residents, off-site maintenance workers, and off-site surface water. PCBs are not volatile; therefore exposure to vapors was not considered as a potential pathway in this assessment.¹ The following potential exposure pathways are considered incomplete:

- *Groundwater ingestion by current or future on-site or off-site residents:* New York City prohibits the use of groundwater (and surface water) for potable supply purposes; therefore, this exposure pathway is not complete for any current or future on-site or off-site receptors. An environmental easement will be filed to ensure that groundwater on the Property is not used for any purpose.
- *Soil dermal contact by future on-site or off-site residents:* Following Property redevelopment, direct contact with soil would be prevented by the presence of structures or impervious surfaces over the majority of the ground surface and a minimum of four feet of clean fill material covering the landscaped areas on the southern and western boundaries of the area (Parcel 3). An environmental easement will be filed to ensure the soil cover is inspected and maintained.

The following pathways are considered potentially complete:

- *Soil dermal contact by on-site environmental and construction workers, off-site residents, and future maintenance workers:* Proposed remediation and construction activities would involve excavation below the water table and possibly some limited dewatering in areas of known soil contamination, which could result in direct contact with the soil. This contact is being mitigated by implementation of the site-specific Health and Safety Plan (HASP) during remedial work in known contaminated areas, and the Construction Health and Safety Plan (CHASP) during general construction. Direct contact with contaminated soil could also occur following general construction during future maintenance activities requiring soil excavation (e.g., repair of utility lines). Potential exposure during future maintenance activities will be addressed by the controls specified in a Site Management Plan (SMP), which will be prepared as part of the Final Remedial Report. An environmental easement will be filed to ensure any future excavation activities are conducted in accordance with the SMP.
- *Groundwater dermal contact or incidental ingestion by on-site environmental and construction workers, and future maintenance workers:* Proposed remediation and construction activities would involve excavation below the water table and limited dewatering, which could result in direct contact with, or accidental ingestion of, contaminated groundwater. This contact will be mitigated by implementation of the site-specific HASP during remediation and CHASP during general construction. Future maintenance activities following general construction could also involve excavation below the water table, resulting in direct contact with groundwater or incidental ingestion. This contact will be addressed by the controls specified in the SMP, and the environmental easement will ensure that any future excavation activities are conducted in accordance with the SMP.

¹ Future residents, workers and customers will be protected from potential exposure to contaminant vapors from soil gas migrating into the proposed buildings. The retail and parking structures will occupy a majority of Parcels 1 and 2 on the first floor of the development, with residential towers (potentially including office space and/or community facilities) above these structures starting at the fifth floor. The Property redevelopment includes a vapor barrier and soil gas venting over the western ½ of the development, and open or actively vented garage space on the ground floor level of the eastern ¾ of the development. Development will also include a cover consisting of either building foundations, impervious surfaces in paved areas, or a minimum of four feet of clean soil in landscaped areas to cover residual soil.

- *Inhalation of particulates by on-site environmental and construction workers, future maintenance workers and on-site or off-site current and future residents:* Remediation activities involved disturbing contaminated soil. This pathway was mitigated during remediation by implementation of the Soil and Groundwater Management Plan (SGMP) and the site-specific HASP with community air monitoring. During general construction, limited excavation below the water table could occur in areas in which soils with concentrations between 10 and 39 ppm were left below the water table. Such excavation activities will be in accordance with the CHASP, which includes community air monitoring. Dust could be released during future maintenance activities requiring excavation below the water table; this will be addressed by the controls specified in the SMP. An environmental easement will be filed to ensure any future excavation activities are conducted in accordance with the SMP.
- *Storm water runoff to the Flushing River:* Contaminated soil exposed during proposed remediation activities could become entrained in storm water runoff, and subsequently enter the Flushing River by overland flow or through the City storm water sewer system. This exposure route will be mitigated during remediation and general construction by implementation of the sediment and erosion control measures contained in the Storm Water Pollution Prevention Plan (SWPPP). The construction SWPPP also includes post-construction requirements relating to maintaining storm water quality.
- *Off-site surface water incidental ingestion, inhalation or dermal contact:* During and following remediation, groundwater is presumed to flow to the Flushing River. Analytical results for groundwater samples collected in monitoring wells on the Property indicated elevated concentrations (relative to NYSDEC Class GA Standards) of PCBs. Since the planned remediation included excavation of the vast majority of contaminated soil, installation of sheeting near the western and southern perimeter of Parcel 3, and dewatering the MW-5 Hotspot Area, the contaminant concentrations are expected to decrease and, therefore, any impact via this exposure pathway will be lessened. The Flushing River is classified as a NYSDEC Class I saline waterbody, suitable for secondary contact recreation, fishing, fish propagation and survival, but not for swimming. The Flushing River is known to have been significantly affected by discharges from industrial properties off-site, including junkyards across the river from the Property (see, for example, *New York Times*, April 26, 2001). The Property's potential contribution to any off-site threat to public health or the environment can only be considered in conjunction with other off-site sources. The potential for significant exposure due to secondary contact is considered minimal.
- *Off-site fish ingestion:* The Flushing River is classified as a Class I saline waterbody, suitable for fishing. The New York State Department of Health issues advisories on eating sportfish. The 2005-2006 advisory applicable to the Flushing River is that infants, children under the age of 15 and women of childbearing age not eat any fish, and that other individuals eat no more than one meal (one-half pound) per week of such fish. Since the planned redevelopment of the Property includes a publicly-accessible waterfront, signs explaining this advisory would be installed.

CONCLUSIONS

The risk that residual contamination could impact human health or the environment has been significantly minimized, based on the following factors:

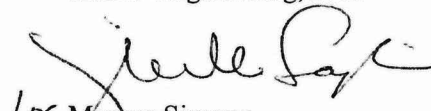
- The areas with residual concentrations of PCBs between 10 and 39 ppm are limited in size, and are all located at least 1 foot below the water table. In addition, past remedial investigations on the Property indicated that PCB concentrations in soil decrease significantly and rapidly with depth.
- The areas with residual concentrations of PCBs between 10 and 39 ppm have been backfilled with a minimum of two (2) feet of clean fill. Backfill consisted of either on-site material which met the Site-Specific Action Level criteria, or imported fill which met the NYSDEC TAGM criterion for PCBs.

As part of the final development, all areas of residual contamination will be covered with a total of at least four (4) feet of clean fill and/or concrete slabs associated with the new building. As shown on Figure 3, the elevation of residual PCBs range in from +1.9 to -1.0 feet, with one location of residual PCBs as deep as elevation -4.8 feet. The minimum top of slab elevation for the new building will be elevation +5.0 feet and the minimum elevation of landscaped areas on Parcel 3 will be elevation +5 feet. Outside of the planned building footprint, a geotextile fabric demarcation layer was placed at the base of the excavation prior to backfilling.

- All post-remediation construction work will be performed in accordance with the CHASP. If construction is to disturb the residual contamination, appropriate health and safety protocols will be followed and any excavated soil will be stockpiled separately and characterized for proper off-site disposal.
- Institutional controls will be implemented to ensure that no unacceptable exposure to residual contamination will occur in the long-term. An environmental easement will be filed to ensure the following: any future excavation activities are conducted in accordance with the forthcoming SMP, the soil cover is inspected and maintained, and groundwater on the Property is not used for any purpose.

We request your confirmation that the remediation performed on the Property constitutes an appropriate risk-based approach to PCB remediation. Please call Marcus at 646-388-9527 or Kate at 646-388-9525 if you have any questions.

Sincerely,
AKRF Engineering, P.C.


for Marcus Simons
Senior Vice President


Kathleen Brunner
Senior Environmental Scientist

Attachments: Tables 1, 2 and 3 – Endpoint Sample Analytical Results, Parcel 1; Endpoint Sample Analytical Results, Parcels 2 and 3; and UST Endpoint Analytical Results for PCBs
Figure 1 – Site Location Map
Figure 2 – Remedial Excavation Plan
Figure 3 – Residual PCB Contamination Plan
Appendix A – September 1, 2005 Notification of Self-Implementation (without attachment)

cc: Vivian Chin – EPA Region 2, Edison, NJ
Daniel Walsh, Ioana Munteanu-Ramnic, Vadim Brevdo – NYSDEC Region 2
Harvey Schultz, Michael Brenner – C.E. Flushing, LLC
Mark Chertok, Jennifer Coghlan – Sive Paget & Riesel

Flushing Industrial Park, Parcel 1

Table 1
Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME	DATE COLLECTED	SAMPLE LOCATION	PARAMETER (ppm)									
			PCBs	Pest.	Total SVOCs	VOCs	Arsenic	Cadmium	Lead	Mercury	Silver	Reac. Cyanide
			10	1, or TAGM	100	TAGM	24	10	500	4	100	Haz. Criterion
EP-200	2/22/2006	East sidewall of MW-18 hotspot					3.4					
EP-201	2/23/2006	WC-37B hotspot area				All<TAGM			643			
EP-202	2/23/2006	WC-37B hotspot area				All<TAGM			1460			
EP-203	2/23/2006	WC-37B hotspot area				All<TAGM			667			
EP-204	2/23/2006	WC-37B hotspot area				All<TAGM			968			
EP-205	3/3/2006	WC-42 hotspot area							102			
EP-206	3/3/2006	WC-42 hotspot area							122			
EP-207	3/3/2006	WC-42 hotspot area							908			
EP-208	3/3/2006	WC-42 hotspot area							306			
EP-209	3/3/2006	WC-42 hotspot area							1110			
EP-210(N)	3/10/2006	North sidewall of WC-37B hotspot (re-excavated)							466			
EP-211(S)	3/10/2006	South sidewall of WC-37B hotspot area (re-excavated)							231			
EP-212(W)	3/10/2006	West sidewall of WC-37B hotspot area (re-excavated)							618			
EP-213(E)	3/13/2006	East sidewall of WC-37B hotspot area (re-excavated)							429			
EP-214	3/24/2006	WC-42 hotspot area (re-excavated)							75.2			
EP-215	3/24/2006	WC-42 hotspot area (re-excavated)							127			
EP-216(W)	4/13/2006	West sidewall of WC-37B hotspot (re-excavated)							613			
EP-217(W)	4/13/2006	West sidewall of hotspot on grid cell F5	0.052	All <1.0	31	All<TAGM	15.7	ND	201	0.24	ND	ND
EP-218(N)	4/13/2006	North sidewall of hotspot on grid cell F5	3.3	All <1.0	21	All<TAGM	12.8	1.1	134	1.4	ND	ND
EP-219(E)	4/13/2006	East sidewall of hotspot on grid cell F5	0.25	All <1.0	2	All<TAGM	1.3	ND	19.5	0.068	ND	ND
EP-220	5/8/2006	Northwest sidewall of hotspot on grid cell F5	0.023	All <1.0	2.48	All<TAGM	ND	ND	15.5	0.033	ND	ND
EP-221	5/8/2006	East sidewall of hotspot on grid cell F5	3.4	All <1.0	600.5	All<TAGM	4.2	ND	110	0.42	0.58	ND
EP-222	5/8/2006	West sidewall of hotspot on grid cell F5	3.2	All <1.0	22.51	All<TAGM	2	ND	123	0.19	ND	ND
EP-223	5/8/2006	Bottom of hotspot on grid cell F5	0.079	All <1.0	1.54	All<TAGM	11.8	ND	36.4	0.071	ND	ND
EP-224	5/8/2006	WC-37B hotspot area (re-excavated)							28.4	0.066		
EP-225 (6')	7/26/2006	North sidewall of SB-76 hotspot	0.15					ND	441	2.2		
EP-226 (6')	7/26/2006	East sidewall of SB-76 hotspot	ND					ND	329	0.067		
EP-227 (6')	7/26/2006	South sidewall of SB-76 hotspot	0.049					ND	44.8	0.083		
EP-228 (6')	7/26/2006	West sidewall of SB-76 hotspot	0.22					ND	51.7	0.091		
EP-229 (1.5')	7/27/2006	North sidewall of YAK-B-37 hotspot							647			
EP-230 (1.5')	7/27/2006	East sidewall of YAK-B-37 hotspot							266			
EP-231 (1.5')	7/27/2006	South sidewall of YAK-B-37 hotspot							877			
EP-232 (1.5')	7/27/2006	West sidewall of YAK-B-37 hotspot							984			
EP-233 (2')	7/27/2006	Bottom endpoint of YAK-B-37 hotspot							1340			

Flushing Industrial Park, Parcel 1

Table 1
Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME	DATE COLLECTED	SAMPLE LOCATION	PARAMETER (ppm)								
			PCBs	Pest.	Total SVOCs	VOCs	Arsenic	Cadmium	Lead	Mercury	Silver
			10	1, or TAGM	100	TAGM	24	10	500	4	100
EP-234 (6')	7/31/2006	North sidewall - extension of SB-76 hotspot	0.31		5.8	All<TAGM					
EP-235 (6')	7/31/2006	South sidewall - extension of SB-76 hotspot	0.06		0.65	All<TAGM					
EP-236 (3')	9/18/2006	North sidewall of YAK-B-37 hotspot (re-excavated)							375		
EP-237 (3')	9/18/2006	South sidewall of YAK-B-37 hotspot (re-excavated)							296		
EP-238 (3')	9/18/2006	West sidewall of YAK-B-37 hotspot (re-excavated)							226		
EP-239 (3')	9/14/2006	North sidewall - 550-gallon UST	51		161.5	All<TAGM					
EP-239A (7')	9/21/2006	Deeper sidewall (bottom) at EP-239	ND		2.48						
EP-240 (7.5')	9/15/2006	Bottom endpoint - 550-gallon UST	1.4		32.53	All<TAGM					
EP-241 (5')	9/15/2006	West sidewall - 550-gallon UST	2.3		10.25	All<TAGM					
EP-242 (2')	9/15/2006	Southeast sidewall sample - F6 UST hotspot	240		18.61	All<TAGM					
EP-242A (5')	9/21/2006	Deeper sidewall (bottom) sample at EP-242	ND								
EP-243 (2.5')	9/15/2006	Bottom sample - F6 UST hotspot	16		57.66	All<TAGM					
EP-243A (5')	9/21/2006	Deeper bottom sample at EP-243	ND								
EP-244 (2')	9/15/2006	South sidewall sample - F6 UST hotspot	5.1		32.82	All<TAGM					
EP-245 (2')	9/15/2006	West sidewall sample - F6 UST hotspot	0.71		39.17	All<TAGM					
EP-246 (5')	9/21/2006	Bottom sample - 60-gallon AST hotspot	ND		ND	All ND					
EP-247 (2')	9/21/2006	West wall sample F6-UST hotspot	2.7		15.66	All ND					
EP-248 (3.5')	9/21/2006	Extended sidewall sample southeast of EP-242	0.71								

Notes: "ND" indicates not detected above the method detection limit

Some laboratory results may be preliminary. Updated results will be included in subsequent reports.

See laboratory analytical reports for complete analytical results, with flags/qualifiers.

Blank space indicates sample not analyzed for that parameter.

Color coding indicates comparison to established Site-Specific Action Levels (SSALs):

Below SSAL

SSAL Exceedance

HAZARDOUS Criteria Exceedance

Flushing Industrial Park, Parcels 2 and 3

Table 2
Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME AND DATE			Concentration (ppm)						
			PCBs	Pesticides	VOCs	SVOCs	Arsenic	Cadmium	Lead
			10	1, or TAGM	TAGM	100	24	10	500
									4
EP-1 (3')	sidewall	5/31/2006	0.29						36.6
EP-2 (3')	sidewall	6/8/2006	2.3						555
EP-3 (3')	sidewall	6/9/2006	31						
EP-4 (4.5')	sidewall	6/7/2006	54						
EP-5 (3')	sidewall	6/7/2006	2.26						
EP-6 (3')	sidewall	6/5/2006	2.02						
EP-7 (3')	sidewall	6/2/2006	0.3						
EP-8 (2')	sidewall	5/24/2006	17				73.3		3.54
EP-9 (2')	sidewall	5/24/2006	230				33.8		5.04
EP-10 (2')	sidewall	5/24/2006	69				6.3		20.4
EP-11 (2')	sidewall	5/24/2006	24.7						0.698
EP-12 (3')	sidewall	6/23/2006	7.2	All <1.0	All<TAGM				
EP-13 (3')	sidewall	6/23/2006	4.7	All <1.0	All<TAGM				
EP-14 (4')	sidewall	5/23/2006	ND	ND	All<TAGM				
EP-15	sidewall	5/10/2006	99						
EP-16	sidewall	5/10/2006	1.5						
EP-17 (2.5')	sidewall	6/21/2006	2.5						
EP-18 (2.5')	sidewall	6/21/2006	18						
EP-19 (2.5')	sidewall	6/21/2006	5.6						
EP-20 (2'-3')	sidewall	5/9/2006	1.7						
EP-21 (3')	sidewall	5/9/2006	0.43						
EP-22 (3')	sidewall	5/17/2006	0.029						
EP-23 (3')	sidewall	5/9/2006	0.032						
EP-24 (3')	sidewall	5/9/2006	0.091						
EP-25 (3')	sidewall	5/9/2006	0.2	All <1.0			8		
EP-26 (3')	sidewall	3/27/2006	2.6	All <1.0	All<TAGM				
EP-27(3')	sidewall	3/27/2006	1.6		All<TAGM				
EP-28 (2')	sidewall	4/7/2006	0.95		All<TAGM				
EP-29 (3')	sidewall	3/23/2006	10		All<TAGM				
EP-30 (4')	sidewall	3/23/2006	80		All<TAGM				
EP-31 (3')	sidewall	3/27/2006	0.0097						
EP-32 (3')	sidewall	3/23/2006	ND		All<TAGM				
EP-33 (3')	sidewall	3/23/2006	0.19		All<TAGM				
EP-34 (2')	sidewall	3/24/2006	2.6						
EP-35 (3')	sidewall	3/24/2006	0.028						
EP-36 (3')	sidewall	3/24/2006	ND						
EP-37 (2')	sidewall	3/24/2006	0.84						
EP-38 (3')	bottom	6/5/2006	9.7						
EP-39 (4.5')	bottom	5/25/2006	26						
EP-40 (5')	bottom	5/24/2006	0.095						0.03
EP-41 (4.5')	bottom	5/23/2006	0.15						
EP-42 (6')	bottom	5/23/2006	0.17	ND					
EP-43 (6.5')	bottom	6/9/2006	1.8					88.6	

Flushing Industrial Park, Parcels 2 and 3

Table 2
Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME AND DATE			Concentration (ppm)							
			PCBs	Pesticides	VOCs	SVOCs	Arsenic	Cadmium	Lead	Mercury
			10	1, or TAGM	TAGM	100	24	10	500	4
EP-44 (3.5')	bottom	6/5/2006	7.8							
EP-45(4.5')	bottom	5/25/2006	0.2							
EP-46(4.5')	bottom	5/25/2006	0.15							
EP-47 (4')	bottom	6/6/2006	0.044							
EP-48 (4.5')	bottom	6/1/2006	0.39							
EP-49 (4')	bottom	5/26/2006	ND							
EP-50 (4')	bottom	5/22/2006	16.2							
EP-51 (4')	bottom	5/22/2006	19	4,4-DDT 1.1; others <1.0		95.6	4.3		711	0.64
EP-52 (4')	bottom	6/12/2006	0.25							
EP-53 (4.5')	bottom	6/13/2006	0.034							
EP-54 (4.5')	bottom	6/6/2006	0.05							
EP-55 (4')	bottom	6/6/2006	5.1							
EP-56 (5')	bottom	5/26/2006	ND							
EP-57(4')	bottom	5/18/2006	2.17							
EP-58 (4')	bottom	5/12/2006	1.25							
EP-59 (4.5')	bottom	6/12/2006	0.024							
EP-60 (4.5')	bottom	6/13/2006	ND							
EP-61 (5')	bottom	6/20/2006	0.046							
EP-62 (5')	bottom	5/26/2006	0.023							
EP-63 (4')	bottom	5/18/2006	0.71							
EP-64 (4')	bottom	5/12/2006	ND		All<TAGM					
EP-65 (5.5')	bottom	5/8/2006	59	Dieldrin 1.7; 4,4-DDT 7.1		462				
EP-65A (6')	bottom	5/12/2006	28	Dieldrin 1.4		2.02				
EP-66 (5')	bottom	6/20/2006	0.36							
EP-67 (5')	bottom	6/20/2006	ND							
EP-68 (5')	bottom	5/30/2006	0.014							
EP-69 (4')	bottom	5/18/2006	7.8							
EP-70 (4')	bottom	5/16/2006	0.64							
EP-71 (5')	bottom	5/11/2006	78							
EP-71B (6.5')	bottom	5/19/2006	0.54							
EP-72 (4')	bottom	6/9/2006	0.1							
EP-73 (5')	bottom	6/20/2006	0.036							
EP-74 (5')	bottom	6/20/2006	0.0062							
EP-75 (5.5')	bottom	6/20/2006	0.0074			0.479				
EP-76 (5.5')	bottom	7/17/2006	0.12			0.2				
EP-77 (5.5')	bottom	7/19/2006	ND							
EP-78 (4.5')	bottom	7/24/2006	0.01							
EP-79 (5')	bottom	5/11/2006	ND							
EP-80 (3.5')	bottom	5/16/2006	2.2							
EP-81 (9')	bottom	5/25/2006	16							
EP-82 (9')	bottom	6/15/2006	0.069							

Flushing Industrial Park, Parcels 2 and 3

Table 2

Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME AND DATE			Concentration (ppm)						
			PCBs	Pesticides	VOCs	SVOCs	Arsenic	Cadmium	Lead
			10	1, or TAGM	TAGM	100	24	10	500
EP-83 (9')	bottom	6/15/2006	0.077		All<TAGM				
EP-84 (3')	bottom	5/17/2006	18						
EP-85 (3')	bottom	5/17/2006	0.025						
EP-86 (3.5')	bottom	5/16/2006	0.3						
EP-87 (9')	bottom	6/12/2006	ND		All<TAGM				
EP-88 (9')	bottom	6/6/2006	0.012		All<TAGM				
EP-89 (5')	bottom	5/15/2006	1.7						
EP-90 (5')	bottom	5/15/2006	1.04						
EP-91 (4.5')	bottom	5/12/2006	ND						
EP-92 (9')	bottom	5/31/2006	ND						
EP-93 (9')	bottom	5/24/2006	ND						
EP-94 (5')	bottom	5/10/2006	1.7	All <1.0			25.7		
EP-95 (9')	bottom	5/26/2006	0.22		All<TAGM				
EP-96 (10.5')	bottom	5/1/2006	0.07		All<TAGM				
EP-97 (9.5')	bottom	5/24/2006	ND		All<TAGM				
EP-98 (5')	bottom	3/24/2006	0.095						
EP-99 (4')	bottom	6/8/2006	0.32						6.3
EP-100 (6')	bottom	5/23/2006	19.1	All <1.0					
EP-100A (8')	bottom	6/16/2006	0.063	All <1.0					
EP-101 (8')	bottom	6/14/2006	0.35						
EP-102 (7')	bottom	6/14/2006	0.017						
EP-103 (8')	bottom	6/14/2006	0.059						
EP-104 (6')	bottom	6/14/2006	0.022						
EP-105 (9')	bottom	5/31/2006	ND		All<TAGM				
EP-106 (12')	bottom	5/1/2006	0.0086		All<TAGM				
EP-107 (5')	sidewall	7/18/2006	2.8						273
EP-108 (5')	sidewall	7/18/2006	0.39						225
EP-109 (5')	sidewall	7/18/2006	ND						10.9
EP-110 (3.5')	sidewall	7/18/2006	ND			0.411			13.7
EP-111 (3.5')	sidewall	7/18/2006	ND			0.14			
EP-112 (5')	sidewall	7/17/2006	1.6			3.12	ND		
EP-113 (5')	sidewall	7/17/2006	0.42			0.44	5		
EP-114 (5')	sidewall	7/17/2006	0.95				ND		
EP-115 (5')	sidewall	7/17/2006	0.42				ND		
EP-116 (5')	sidewall	6/26/2006	0.097	All <1.0		1.08	ND		24.9
EP-117 (5')	sidewall	6/26/2006	0.16	All <1.0		1.9	ND		304
EP-118 (5')	sidewall	6/26/2006	ND	All <1.0		15.96	14.4		196
EP-119 (5')	sidewall	6/26/2006	0.089				12.1	ND	221
EP-120 (5')	sidewall	6/26/2006	0.35				8.8		181
EP-121 (5')	sidewall	6/26/2006	0.061	All <1.0			ND	ND	220
EP-122 (5')	sidewall	6/28/2006	ND	All <1.0				ND	
EP-123 (5')	sidewall	6/26/2006	0.26	All <1.0				ND	

Flushing Industrial Park, Parcels 2 and 3

Table 2

Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME AND DATE			Concentration (ppm)							
			PCBs	Pesticides	VOCs	SVOCs	Arsenic	Cadmium	Lead	Mercury
			10	1, or TAGM	TAGM	100	24	10	500	4
EP-124 (6.5')	bottom	6/26/2006	320	Dieldrin 1.4; 4,4-DDT 3.6		133.33	48.2		522	2.86
EP-124A (7.5')	bottom	7/20/2006	6.2	All <1.0		8.12	51.5		98.7	1
EP-125 (5.5')	bottom	6/26/2006	39	4,4-DDT 1.1 (<TAGM); others <1.0		717	15.6		292	2.61
EP-126 (5.5')	bottom	6/26/2006	3.6						212	3.3
EP-127 (5.5')	bottom	6/26/2006	5.2						83	6.9 (TCLP <0.0009 mg/l)
EP-128 (5.5')	bottom	6/26/2006	2.4	All <1.0				ND	246	1.4
EP-129 (5.5')	bottom	6/26/2006	1.4	All <1.0				ND		
EP-130 (5.5')	bottom	6/26/2006	11	All <1.0				ND	457	
EP-131 (5.5')	bottom	6/26/2006	22	4,4-DDD 1.8; 4,4-DDT 3.0			31.5	2.5	610	
EP-132 (5.5')	sidewall	6/26/2006	0.15				24.6			
EP-133 (7')	bottom	6/28/2006	ND	All <1.0		0.71	ND		9.2	ND
EP-134 (5')	sidewall	6/26/2006	0.12	All <1.0		13.03	23.7		188	1.28
EP-135 (5')	sidewall	6/26/2006	210	All <1.0		124.84	33.1		819	8.81 (TCLP <0.0009 mg/l)
EP-135A (7')	bottom	7/21/2006	0.36			0.16	10.9		164	0.59
EP-136 (5')	sidewall	6/26/2006	7.5			24.5			1070	
EP-137 (5')	sidewall	6/26/2006	3.02						114	
EP-138 (5')	sidewall	6/26/2006	0.45				6.6		79.1	
EP-139 (5.5)	sidewall	6/26/2006	0.37				24.2			
EP-140 (6.5')	sidewall	7/20/2006	ND				9.5			
EP-141 (6.5')	sidewall	7/20/2006	ND				12.9			
EP-142 (6.5')	sidewall	7/20/2006	0.034				ND			
EP-143 (6.5')	sidewall	7/20/2006	ND				23.7			
EP-144 (6.5')	sidewall	7/21/2006	ND						8.7	
EP-145 (6.5')	sidewall	7/21/2006	0.8						50.2	
EP-146 (6.5')	sidewall	7/20/2006	ND						7.7	
EP-147 (6.5')	sidewall	7/21/2006	ND						20.5	
EP-148 (6')	bottom	7/31/2006	0.44							
EP-149 (6.5')	bottom	7/27/2006	0.75							
EP-150 (6')	bottom	7/26/2006	6							
EP-151 (6.5')	bottom	7/27/2006	1.2							
EP-152 (6')	bottom	7/26/2006	19.2							
EP-153 (6')	bottom	7/26/2006	ND							
EP-154 (5.5')	bottom	7/24/2006	0.055							
EP-155 (6')	bottom	7/24/2006	0.014							
EP-156 (5.5')	bottom	7/24/2006	0.026							
EP-157 (6.5')	sidewall	7/20/2006	ND						234	
EP-158 (6.5')	sidewall	7/20/2006	ND						98.6	
EP-159 (6.5')	sidewall	7/20/2006	ND						9.2	

Flushing Industrial Park, Parcels 2 and 3

Table 2

Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME AND DATE			Concentration (ppm)							
			PCBs	Pesticides	VOCs	SVOCs	Arsenic	Cadmium	Lead	Mercury
			10	1, or TAGM	TAGM	100	24	10	500	4
EP-160 (6')	sidewall	7/20/2006	ND						583	
EP-160A (7.5')	bottom	7/27/2006							323	
EP-161 (7')	sidewall	7/21/2006	1.9	All <1.0 or no TAGM		32.37	13.2		114	0.22
EP-162 (6.5')	sidewall	7/24/2006							11.8	
EP-163 (5')	sidewall	7/25/2006					7			
EP-164 (5')	sidewall	7/26/2006					6.5			
EP-165 (5')	sidewall	7/26/2006					9.7			
EP-166 (6')	sidewall	7/27/2006							53.3	
EP-167 (2')	sidewall	9/18/2006	0.41	All <1.0	All<TAGM	15.4	2.9	ND	82.8	0.22
EP-168 (2')	sidewall	9/18/2006	ND	All ND	All<TAGM	2.74	4	ND	68.4	0.037
EP-169 (2')	sidewall	9/18/2006	3.6	All <1.0	All<TAGM	21.8	6.6	2.8	430	0.92
EP-170 (2')	sidewall	9/18/2006	ND	All <1.0	All<TAGM	11.4	5.5	ND	224	0.15
EP-171 (2.5')	sidewall	9/18/2006	ND	All ND	All<TAGM	ND	ND	ND	7.2	ND
EP-172 (3')	sidewall	9/18/2006	ND	All ND	All<TAGM	4.4	6.6	ND	184	4.3
EP-173 (7')	bottom	9/18/2006	ND	All ND	All<TAGM	2.3	ND	ND	194	0.92
EP-174 (2')	sidewall	9/18/2006	0.48	All <1.0	All<TAGM	33.6	11.5	ND	106	0.16
EP-175 (2')	sidewall	9/18/2006	ND	All ND	All<TAGM	0.3	ND	ND	29.2	ND
EP-176 (2')	sidewall	9/18/2006	0.71	All <1.0	All<TAGM	49.9	4.6	1.5	43.2	0.087
EP-177 (5')	sidewall	9/22/2006	ND	ND	All<TAGM	0.83	2.5	ND	36.3	0.031
EP-178 (4')	sidewall	9/22/2006	2.2	All <1.0	All<TAGM	62.16	6.4	2	156	0.7
EP-179 (8')	bottom	9/22/2006	ND	ND	All<TAGM	0.22	6.2	ND	35.3	0.09
EP-180 (4')	sidewall	9/22/2006	0.48	All <1.0	All<TAGM	5.05	3.1	ND	93.2	0.19
EP-181 (7')	bottom	9/22/2006	ND	ND	All<TAGM	ND	7	ND	48.3	0.039
EP-182 (4')	sidewall	9/22/2006	ND	ND	All<TAGM	6.48	13.2	ND	242	2.2
EP-183 (7')	bottom	9/22/2006	0.86	All <1.0	All<TAGM	10.98	35	ND	331	1.7

Notes:

"ND" indicates not detected above the method detection limit

See laboratory analytical reports for complete analytical results with qualifiers. Some results are preliminary.

Blank space indicates sample not analyzed for that parameter.

Color coding indicates comparison to the indicated Site-Specific Action Levels (SSALs):

Below SSAL

SSAL Exceedance

Hazardous Criteria Exceedance

Flushing Industrial Park

Table 3

UST Endpoint Analytical Results
PCBs

Dilution Method Blank Client ID Lab Sample ID Date Sampled Units	Site-Specific Action Level ug/Kg (ppb)	200 MB-63107 CE-UST-BOTTOM EAST-1 212406-001 3/16/2006 ug/Kg	20 MB-63107 CE-UST-BOTTOM WEST-2 212406-002 3/16/2006 ug/Kg	20 MB-65287 CE-UST-S-3 212770-001 4/27/2006 ug/Kg	1 MB-65287 CE-UST-E-4 212770-002 4/27/2006 ug/Kg	1 MB-65287 CE-UST-E-5 212770-003 4/27/2006 ug/Kg	1 MB-65287 CE-UST-N-6 212770-004 4/28/2006 ug/Kg	1 MB-65287 CE-UST-N-7 212770-005 4/28/2006 ug/Kg
Compound								
Aroclor 1016		700 U	70 U	64 U	3.1 U	3.3 U	3 U	3.2 U
Aroclor 1221		380 U	38 U	35 U	1.7 U	1.8 U	1.7 U	1.8 U
Aroclor 1232		460 U	47 U	42 U	2.1 U	2.2 U	2 U	2.1 U
Aroclor 1242		740 U	75 U	68 U	3.3 U	3.5 U	3.2 U	3.5 U
Aroclor 1248		670 U	67 U	61 U	3 U	3.1 U	2.9 U	3.1 U
Aroclor 1254		300 U	30 U	28 U	76 M	1.4 U	1.3 U	1.4 U
Aroclor 1260		16000 M	3700 M	1300	170	10 JM	9.9 J	13 JM
Total PCBs	10,000	16000 M	3700 M	1300	246	10	9.9	13

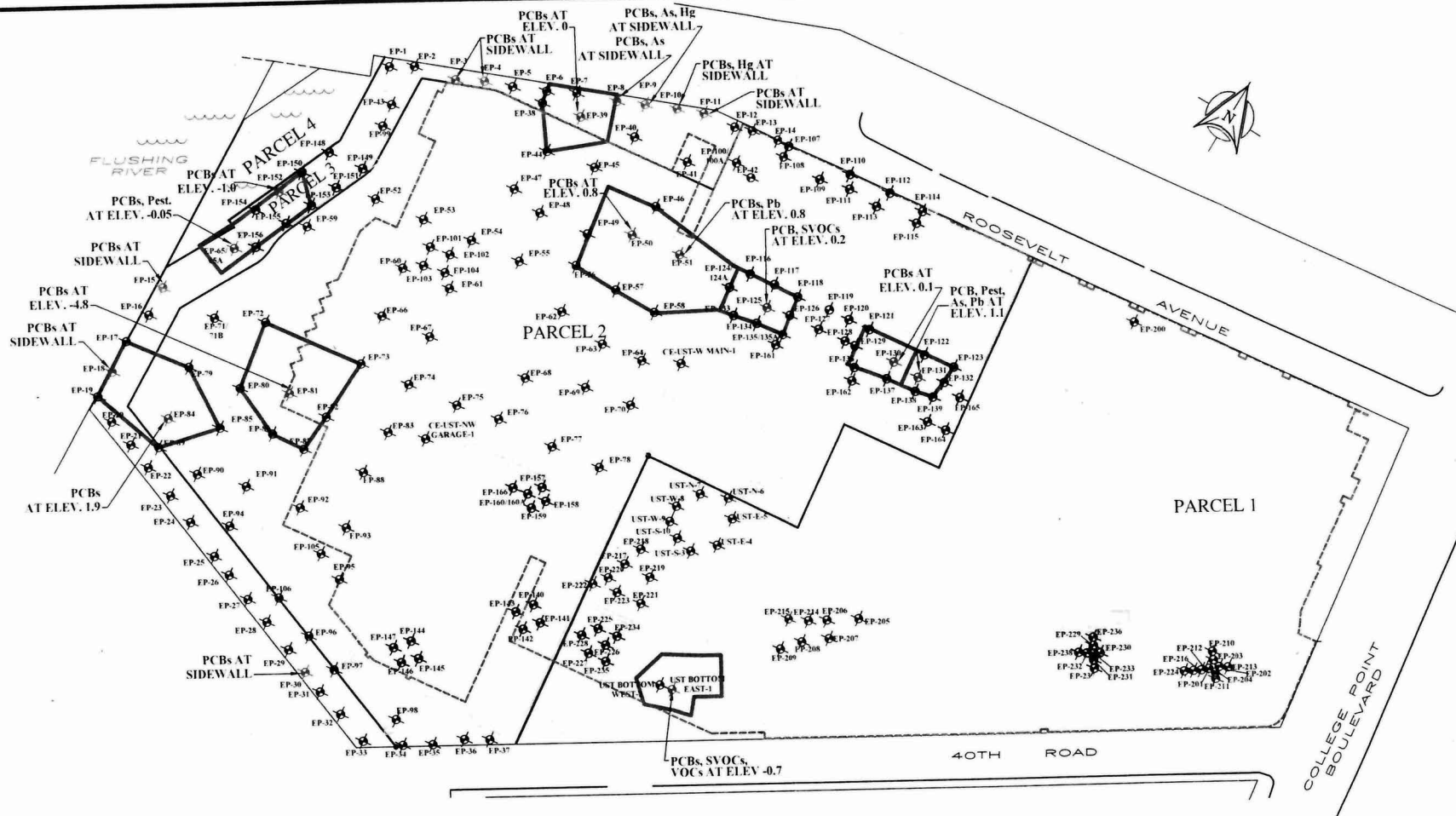
Flushing Industrial Park

Table 3

UST Endpoint Analytical Results
PCBs

Dilution Method Blank Client ID Lab Sample ID Date Sampled Units	Site-Specific Action Level ug/Kg (ppb)	1 MB-65287 CE-UST-W-8 212770-006 4/28/2006 ug/Kg	2 MB-65869 CE-UST-W-9 212770-007 4/28/2006 ug/Kg	5 MB-65869 CE-UST-S-10 212770-008 4/28/2006 ug/Kg	1 MB-67292 CE-UST-NW-GARAGE-1(9) 213074-004 6/12/2006 ug/Kg	1 MB-67394 CE-UST-W MAIN-1(9) 213096-001 6/14/2006 ug/Kg
Compound						
Aroclor 1016		3.2 U	6.3 U	16 U	7.7 U	7 U
Aroclor 1221		1.8 U	3.4 U	9 U	4.2 U	3.8 U
Aroclor 1232		2.2 U	4.2 U	11 U	5.1 U	4.6 U
Aroclor 1242		3.5 U	6.7 U	18 U	8.2 U	7.4 U
Aroclor 1248		3.1 U	6 U	16 U	7.4 U	6.7 U
Aroclor 1254		1.4 U	200	7.1 U	3.3 U	3 U
Aroclor 1260		47 M	280	540 M	11 U	35 JM
Total PCBs	10,000	47	480	540	ND	35

FIGURES



NOTE:
ALL ELEVATIONS ARE IN BOROUGH OF QUEENS TOPOGRAPHICAL BUREAU DATUM, WHICH IS 2.725 FEET ABOVE MEAN SEA LEVEL AT SANDY HOOK, NJ 1929



LEGEND:

- FORMER BUILDING LINE
- - - PLANNED DEVELOPMENT FOOTPRINT
- APPROXIMATE EXTENT OF RESIDUAL PCB CONTAMINATION (>10 ppm)
- ENDPOINT SAMPLE LOCATION
- SOIL PCB CONCENTRATIONS >10 ppm (SSAL)
- SOIL PCB CONCENTRATIONS >50 ppm



Environmental Consultants
440 Park Avenue South, New York, N.Y. 10016

FLUSHING INDUSTRIAL PARK FLUSHING, NEW YORK

RESIDUAL PCB CONTAMINATION PLAN

DATE
10.25.06

SCALE
1"=100'

PROJECT No
30141

FIGURE No
3

APPENDIX A

**SEPTEMBER 1, 2005 NOTIFICATION OF SELF-IMPLEMENTATION
(without attachment)**



AKRF Engineering, P.C.
440 Park Avenue South, 7th Floor
New York, NY 10016
Phone: 212-696-0670
Fax: 212-726-0942
www.akrf.com

September 1, 2005

Ms. Kathleen Callahan
Acting Regional Administrator
Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007-1866

Re: PCB Notification - 40 CFR 761.61(a)
Flushing Industrial Park, College Point Boulevard and 40th Road, Flushing, New York

Dear Ms. Callahan:

AKRF Engineering, P.C. (AKRF) represents C.E. Flushing, LLC, a company pursuing the cleanup and redevelopment of the Flushing Industrial Park property in Flushing, Queens (the Property) under the New York State Brownfield Cleanup Program (BCP). The Property is bounded to the north by Roosevelt Avenue, to the east by College Point Boulevard, to the south by 40th Road, and to the west by the Flushing River and the Van Wyck Expressway. The surrounding area is primarily industrial/commercial in nature, although multi-family housing is located across College Point Boulevard to the east.

In 2001, C.E. Flushing, LLC entered into a Voluntary Cleanup Agreement (VCA) with the New York State Department of Environmental Conservation (NYS DEC) with regard to the Property. While in the Voluntary Cleanup Program, the Property was divided into four Operable Units (OUs). In December 2004, C.E. Flushing, LLC entered into separate Brownfield Cleanup Agreements (BCAs) with NYS DEC for the completion of the remedial program for the Property under the BCP as a Volunteer for each of four Parcels – each one generally matching the former OU. Parcel 1, BCP Site No. C241051, (formerly OU-1) consists of the eastern portion of the Property and comprises approximately 5.3 acres. Parcel 2, BCP Site No. C241078, (6.7 acres) consists of the remainder of the western portion of the Property, with the exception of a 55-foot strip of the Flushing River Waterfront and two additional strips north and south of a proposed retail structure (Parcel 3, BCP Site No. C241079, 1.1 acre), and the portion of the Property located in the Flushing River (Parcel 4, BCP Site No. C241080, 0.3 acre).

Planned development consists of commercial and residential use for Parcels 1 and 2, and a waterfront esplanade consisting of both landscaped and paved areas with upland connections on Parcel 3. Retail and parking structures will occupy a majority of the Property on the first four floors of the development. Residential dwellings (which may include some office space and/or community facilities) will be constructed above the retail and parking structures.

Environmental studies conducted between 1989 and 2005 indicated the presence of polychlorinated biphenyls (PCBs) on Parcels 1, 2 and 3 and petroleum-contaminated soil and groundwater (primarily on Parcels 2 and 3). In addition, Parcels 1, 2 and 3 contain some soil with elevated levels of heavy metals, pesticides, and semi-volatile organic compounds. The *Revised OU-1: Remedial Action Work Plan and Supplemental Investigation Work Plan* has been approved by the NYSDEC. AKRF is currently working with the NYS DEC to finalize the *Revised Interim Remedial Measure Work Plan for Parcel 2 and 3*, which will be followed later this year by the RAWP for these Parcels.

This letter represents notification of the intention to begin cleanup of PCB remediation waste on October 3, 2005 under 40 CFR 761.61(a). The following work plans and reports detailing the extensive investigation data and planned remediation at the property were previously submitted to Mr. Daniel Kraft of EPA Region 2:

- August 2003 *Revised OU-1: Remedial Action Work Plan and Supplemental Investigation Work Plan* and associated correspondence;
- redlined version of October 2004 *Parcels 2 and 3 Revised Remedial Investigation Report*;
- redlined version of October 2004 *Supplemental Investigation Task Report No. 1* (Parcel 1 Soil Study and Parcels 1, 2 & 3 Groundwater Study);
- July 2005 *Revised Interim Remedial Measure Work Plan*; and
- Draft drawing depicting the PCB concentrations identified in soil samples collected from the site.

Per the regulations, a summary of the site information is as follows:

(A) The nature of the contamination, including kinds of materials contaminated.

Soils on Parcels 1, 2 and 3 are contaminated with PCBs with levels varying from non-detectable to in excess of 1,000 parts per million (ppm). There are also areas of light non-aqueous phase liquid (LNAPL) oils containing PCBs, with levels varying from non-detectable to in excess of 10,000 ppm.

(B) A summary of the procedures used to sample contaminated and adjacent areas and a table or cleanup site map showing PCB concentrations measured in all pre-cleanup characterization samples. The summary must include sample collection and analysis dates.

Soils have been sampled in 1989 (by others) and by AKRF since 1999. Samples were collected using motorized rotary drilling or Geoprobe direct push equipment. To date, samples from over 750 borings have been collected and analyzed. A map showing sampling locations and a graphical depiction of the highest PCB concentration per boring is attached as Figure 1.

(C) The location and extent of the identified contaminated area, including topographic maps with sample collection sites cross referenced to the sample identification numbers in the data summary from (B).

Figure 1 shows the planned excavation areas and the sample locations.

(D) A cleanup plan for the site, including schedule, disposal technology, and approach. This plan should contain options and contingencies to be used if unanticipated higher concentrations or wider distributions of PCB remediation waste are found or other obstacles force changes in the cleanup approach.

The Revised Interim Remedial Measure Work Plan, dated July 2005 and previously provided to Dan Kraft, provides for the removal of areas of delineated LNAPL using oil absorbent socks and pads. LNAPL will be sent off-site for incineration.

In addition, the outdoor portions of Parcels 2 and 3 will be excavated to the water table. The area inside the MW-5 Hotspot Area, consisting of an approximately 150-foot by 240-foot area encompassing the MW-5, OB-17 and B-8 hotspots, will be sheeted and dewatered to facilitate the removal of hazardous concentrations of PCBs identified in soil samples collected below the water table. In addition, at other locations where existing data or endpoint sampling indicates hazardous concentrations of PCBs, saturated soil excavation will continue to remove hazardous soil from below the water table as Property conditions allow. The RAWP ultimately developed for Parcels 2 and 3 will require the same extent of excavation below existing site buildings.

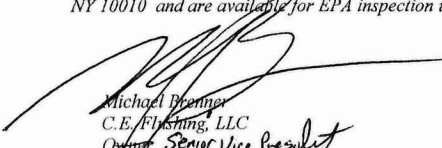
The Revised OU-1: Remedial Action Work Plan and Supplemental Investigation Work Plan, also provides for removal of the one identified PCB hot spot on Parcel 1.


All PCB-contaminated soils (those with PCBs above 50 ppm and below 50 ppm) will be sent off-site for disposal (landfilling).

Remediation is scheduled to begin on October 5, 2005 and continue through September 2006. Should unanticipated higher concentrations or wider distributions of PCB remediation waste be found, additional cleanup above or below the water table would be possible with the equipment mobilized at the site. There are no foreseen obstacles that would force changes in the cleanup approach.

(E) Written certification:

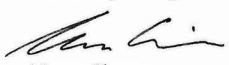
All sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at AKRF's office at 440 Park Avenue South, New York, NY 10010 and are available for EPA inspection upon request:



Michael Brenner
C.E. Flushing, LLC
Owner, Senior Vice President


Marcus Simons
Senior Vice President, AKRF
Party Conducting the Cleanup

We would appreciate the agency's confirmation that contaminated soils with less than 50 ppm of PCBs may be disposed as non-hazardous waste. We look forward to your response. Please call Kate Brunner (646-388-9525) or Marcus Simons (646-388-9527) if you have any questions.

Sincerely,
AKRF Engineering, P.C.


Marcus Simons
Senior Vice President


Kathleen Brunner
Senior Environmental Scientist

Enclosure: Figure 1 – Excavation Plan

cc:

Ms. Denise M. Sheehan, Acting Commissioner, NYS Department of Environmental Conservation
Ms. Emily Lloyd, Commissioner, New York City Department of Environmental Protection
Mr. Daniel Kraft - EPA Region 2, Edison
Mr. Dan Walsh/Ms. Ioana Munteanu-Ramnic/Mr. Vadim Brevdo, NYSDEC Region 2
Mr. Mike Brenner/Mr. Harvey Schultz, C.E. Flushing, LLC
Mr. Mark Chertok/Ms. Jennifer Coghlan, Sive Paget & Riesel